

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

UNITED STATES SUGAR CORPORATION,  
UNITED SUGARS CORPORATION,  
IMPERIAL SUGAR COMPANY, and  
LOUIS DREYFUS COMPANY LLC,

*Defendants.*

Civil Action No. 1:21-cv-01644-MN

**STIPULATION REGARDING DISCOVERY DEADLINES**

Pursuant to Rule 29 of the Federal Rules of Civil Procedure, the Parties, United States of America, United States Sugar Corporation, United Sugars Corporation, Imperial Sugar Company, and Louis Dreyfus Company LLC, by and through their undersigned counsel, hereby stipulate that pursuant to the Court's Scheduling Order, D.I. 70, each side will exchange its final trial witness list on February 28, 2022, according to the terms of the Scheduling Order. Because the parties have timely noticed fact depositions that are currently scheduled to occur following the close of fact discovery on February 25, 2022, the sides may exchange revised witness lists no later than Saturday, March 12, to account for those additional depositions. The revised witness list shall include no more than 22 fact witnesses to appear at trial. The only persons who can be added to a side's March 12 list are individuals whose timely noticed depositions occurred on or between February 28 and March 11, unless otherwise agreed to by the parties. The parties further agree that in the event any of the aforementioned timely noticed fact depositions takes place after March 11, either side may add such witness(es) to its respective final witness list no later than 24 hours after the conclusion of any said deposition, provided that the total number of fact witnesses not exceed 22 at that time. All other provisions of the

Scheduling Order apply. This stipulation does not affect or change any deadlines set forth in the Scheduling Order, except that the parties agree to confer about the timing for the exchange of deposition designations and/or exhibits related to any additional witnesses properly included on any side's revised March 12 witness list, whose deposition occurred between February 28 and March 11, or any additional witness(es) properly added to a party's final witness list after March 12.

Dated: February 28, 2022

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